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April 18, 2025

Hon. Mary Kay Vyskocil  
 Southern District of New York  
 Daniel Patrick Moynihan U.S. Courthouse  
 500 Pearl Street  
 New York, NY 10007-1312

USDC SDNY  
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Re: L.W., individually and on behalf of her son K.W. v. New York City Department of Education, No.: 1:24-cv-07716-MKV

Dear Judge Vyskocil:

We represent Plaintiff in this action and respectfully request a 30-day extension of the April 22, 2025 deadline set in the Court's Order, dated April 15, 2025 (ECF 38), to file a joint status letter, and for Plaintiff's counsel to file a simultaneous motion for attorneys' fees, should such fees remain in dispute. This is Plaintiff's first request for an extension of this deadline.

Plaintiff's counsel emailed Defendant's counsel on April 17, 2025 to request consent to seek an extension of time to respond to the Court's Order, pending Defendant's anticipated response "next week" to Plaintiff's attorneys' fee application filed back in October 2024 (Ex. A hereto). Although we have not received a response, we request additional time to allow us to confer with opposing counsel and determine whether Plaintiff's fee request can be resolved without the need for further motion practice before the Court. If Plaintiff's fee request cannot be resolved, Plaintiff's counsel requests the additional time to prepare an appropriate motion and respond to Defendant's position, particularly in light of the upcoming holiday weekend.

For the foregoing reasons, Plaintiff respectfully requests that the Court grant a 30-day extension of time, up to and including May 22, 2025, to file the joint status report and, if necessary, a motion for attorneys' fees as ordered by the Court.

Respectfully submitted,

David J. Abrams

**Granted. SO ORDERED.**

Attachment  
 cc via ECF: Saarah S. Dhinsa

Date: April 21, 2025  
 New York, New York

Mary Kay Vyskocil  
 United States District Judge